

FILED IN OPEN COURT
U.S.D.C. Atlanta

FEB 25 2015

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

JAMES N. HATTEK, Clerk
By: *[Signature]*
Deputy Clerk

UNITED STATES OF AMERICA

v.

TORI K. COLLINS

Criminal Information

No. 1:15-CR-56-WSD

THE UNITED STATES ATTORNEY CHARGES THAT:

COUNT
Conspiracy
18 U.S.C. § 371

1. From on or about March 10, 2013 through on or about June 14, 2013, in the Northern District of Georgia, the defendant, TORI K. COLLINS, knowingly and willfully conspired and agreed together with G.S.M. and others known and unknown, to, as an employee of a financial institution, corruptly accept and agree to accept a thing of value, that is, cash in excess of \$1,000.00, intending to be influenced or rewarded in connection with any business or transaction of the financial institution, in violation of Title 18, United States Code, Section 215.

MANNER AND MEANS

2. It was a part of the conspiracy that the defendant, TORI K. COLLINS, used her position as a personal banker employed by Wells Fargo Bank to allow G.S.M. to open accounts in the names of, and deposit and withdraw funds from accounts titled in the names of, other individuals, in violation of bank procedures.

OVERT ACTS

3. In furtherance of the conspiracy and to effect the objects of the conspiracy, on or about June 11, 2013, in the Northern District of Georgia, the defendant, TORI K. COLLINS, assisted G.S.M. in making a \$69,000.00 withdrawal from a Wells Fargo Bank account, x3267, in the name of an individual with the initials J.A.

All in violation of Title 18, United States Code, Section 371.

JOHN HORN

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